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9 Counsel to E. Lynn Schoenmann
10 Trustee in bankruptcy

11 UNITED STATES BANKRUPTCY COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 SAN FRANCISCO DIVISION

14 In re

Case No. 21-30299
Chapter 7

15 ACEH CAPITAL, LLC
16 aka ACE Capital, LLC,

Debtor.

17 APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF ACCOUNTANT

18 PURSUANT TO SECTION 11 U.S.C. SECTION 327(a)

19 TO: THE HONORABLE DENNIS MONTALI,
20 UNITED STATES BANKRUPTCY JUDGE

21 1. E. LYNN SCHOENMANN ("Applicant") is the duly appointed, qualified and acting
22 Chapter 7 trustee herein.

23 2. The Applicant deems it to be in the best interest of this estate to employ Bachecki,
24 Crom & Co., LLP, Certified Public Accountants ("Accountant") as the Trustee accountant to
25 prepare and file tax returns; to prepare tax projections and perform tax analysis; to perform
26 investigation of investor real property transactions; to analyze tax claims filed in this case, if
27 necessary; to analyze the tax impact of potential transactions, if necessary; to analyze as to
28 avoidance issues, if necessary; to prepare a solvency analysis, if necessary; to testify as to

1 avoidance issues, if necessary; to prepare wage claim withholding computations and payroll tax
2 returns, if necessary; to serve as Trustee's general accountant and to consult with the Trustee and
3 the Trustee's counsel as to those matters.

4 3. The accountant has indicated a willingness to perform the services required by the
5 Applicant. The Applicant desires an order authorizing the Trustee to pay the Accountant for
6 services rendered and costs and expenses advanced or incurred in the rendering of such services
7 after a hearing duly noticed to creditors or other parties in interest, the United States Trustee and
8 subject to review for reasonableness by this Court. The normal billing rates for the Accountant
9 are as follows:

10 Partners	\$425 - \$545 / hour
11 Senior Accountant	\$250 - \$410 / hour
12 Junior Accountant	\$150 - \$250 / hour

13 4. The Applicant has investigated the qualifications of the Accountant. The Applicant is
14 informed and believes, and based thereon allege, that except for the Accountant's employment by
15 the Applicant in unrelated cases and as disclosed herein, neither the Accountant nor its employees
16 have any connections with the debtor, creditors, or any party in interest, their respective attorneys
17 or accountants, or the United States Trustee or any other person employed by the office of the
18 United States Trustee and that the employment of the Accountant on the conditions set forth
19 herein is in the best interest of creditors. **The Accountant discloses the following information**
20 **in the event that it is considered a connection: The Accountant serves as the personal tax**
21 **accountant for the Trustee.**

22 5. To the Applicant's best information and belief, the Accountant does not hold an interest
23 adverse to the estate, and they are disinterested persons as required by 11 USC Section 327(a).

24 6. The Applicant is informed and believes, and based thereupon alleges, that this is proper
25 case for the entry of an order without notice to creditors in that the matters to be ruled upon are
26 purely administrative in nature and any fees paid or to be paid will be subject to Court review
27 after notice and hearing.
28

1 WHEREFORE, the Applicant prays that this court make and enter its order:

- 2 1. Authorizing the Applicant to employ Bachecki, Crom & Co., LLP, Certified Public
3 Accountants, as the accountant in this case;
4
5 2. Authorizing the Applicant to pay the Accountant services rendered and for the costs
6 and expenses advanced or incurred in the rendering of such services after a hearing duly noticed
7 to the Office of the United States Trustee, creditors and other parties in interest and subject to
8 review for reasonableness by this court, and;
9
10 3. For such other relief as may be proper.

11 DATED: 4/29/21


12 E. LYNN SCHOENMANN, Trustee for the Estate
13 of ACEH CAPITAL, LLC

14 DATED: April 26, 2021

/s/ Aron M. Oliner (152373)
15 ARON M. OLINER
16 Counsel for E. Lynn Schoenmann, Trustee
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